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**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

AMERICAN FEDERATION OF  
GOVERNMENT EMPLOYEES, *et al.*

Plaintiffs,

v.

UNITED STATES OFFICE OF PERSONNEL  
MANAGEMENT, *et al.*,

Defendants.

Case No. 3:25-cv-1780-WHA

**STIPULATION AND [PROPOSED]  
ORDER RE: DEFENDANTS'  
ADMINISTRATIVE MOTION TO FILE  
UNDER SEAL**

1 Pursuant to Civil Local Rule 7-11, 7-12, and 79-5, the parties hereby stipulate and  
2 respectfully request that the Court grant Defendants' Administrative Motion to File Under Seal  
3 and permit unredacted copies of the following documents to be filed under seal to protect the  
4 personal identifying information of the federal employees identified therein and to comply with  
5 this Court's April 18, 2025 preliminary injunction:

6 1. U.S. Department of Agriculture's declaration providing details of employees  
7 whose terminations were carried out after an individualized evaluation of their performance.

8 2. U.S. Department of Defense's declaration providing details of employees whose  
9 terminations were carried out after an individualized evaluation of their performance.

10 3. U.S. Department of Defense's list of employees whose terminations were carried  
11 out after an individualized evaluation of their performance.

12 4. U.S. Department of Energy's unredacted declaration providing details of  
13 employees whose terminations were carried out after an individualized evaluation of their  
14 performance.

15 5. U.S. Department of State's unredacted declaration providing details of employees  
16 whose terminations were carried out after an individualized evaluation of their performance.

17 6. U.S. Veterans' Administration's declaration providing details of employees  
18 whose terminations were carried out after an individualized evaluation of their performance.

19 7. U.S. Veterans' Administration's declaration providing details of one employee  
20 whose termination was carried out after an individualized evaluation of that employee's  
21 performance.

22 8. National Science Foundation's list of one employee terminated on an  
23 individualized basis.  
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1 DATED: May 8, 2025

2 Respectfully submitted,

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**[PROPOSED] ORDER**

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED:

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HON. WILLIAM H. ALSUP  
Senior United States District Judge